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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re:

GIGA WATT, Inc., a Washington
corporation,

Debtor.

Case No. 18-03197 FPC 11

The Honorable Frederick P. Corbit

**DECLARATION OF LAUREN
MIEHE IN SUPPORT OF OMNIBUS
OPPOSITION OF THE CHAPTER
11 TRUSTEE TO: (I) NOTICE AND
MOTION TO COMPEL TRUSTEE
TO ABANDON ALLRISE MINING
POD AND (II) APPLICATION OF
ALLRISE FINANCIAL GROUP FOR
ALLOWANCE AND PAYMENT OF
ADMINISTRATIVE EXPENSE
CLAIM**

DECLARATION OF LAUREN MIEHE

1 I, Lauren Mieke, declare as follows:

2 1. I submit this declaration in support of the *Omnibus Opposition of the*
3 *Chapter 11 Trustee to: (i) Notice and Motion to Compel Trustee to Abandon*
4 *Allrise Mining Pod and (ii) Application of Allrise Financial Group for Allowance*
5 *and Payment of Administrative Expense Claim* (the “**Opposition**”), which I have
6 read.

7 2. The statements set forth herein are based on my personal knowledge,
8 unless otherwise noted. If called as a witness, I would and could competently
9 testify thereto.

10 3. Unless otherwise defined herein, capitalized terms have the meanings
11 ascribed to them in the Opposition.

12 4. I am employed by the estate in the above-captioned case to supervise
13 the Trustee’s operations at the Moses Lake Facility and the Debtor’s other facility,
14 known as the TNT Facility.

15 5. No insignia were placed on the Pod. No indication of any kind was
16 ever made that Allrise was conducting business at the Pod or claimed ownership
17 of the Pod.

18 6. After the Trustee received this Court’s permission to operate part of
19 the Moses Lake Facility, the Master Landlord entrusted the keys to the Moses
20 Lake Facility to Allen Oh and to me. We kept the Pod locked at all times. I never
21 removed any equipment from the Pod. The Trustee maintains security cameras
22 which allow the Trustee to know who enters and leaves the Moses Lake Facility at
23 all times. There has never been any indication of the removal of any equipment
24 from the Pod, other than as set forth below. I have reviewed the security camera
25 tapes in order to ensure that nothing is ever removed from the Moses Lake Facility
without the Trustee’s knowledge and permission.

7. After the Master Landlord paid to have the electricity turned on for the Pod and its neighbor, Pod 2, the Trustee began operations in Pod 2. The Pod, in which Allrise asserts an interest, remained dormant and not operational pending the removal by Allrise of the equipment that it claimed belonged to it. Again, no one removed any equipment from the Pod in which Allrise claims an interest.

8. After Allrise removed its miners from the Pod, under Allen Oh's supervision, my team installed miners and began operations in the Pod. We never operated in the Pod before Allrise removed its equipment.

To the best of my knowledge, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 17th day of February 2020 in Wenatchee, Washington.

Lauren Mieke